

Ure Law Firm

(SPACE BELOW FOR FILING STAMP ONLY)

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Attorney for Debtors

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

IN RE:

) **Case No. 2:14-bk-25039-NB**

MICHAEL DERMONT HILL
REGINA DELORSE HILL,

) **CHAPTER 13**

Debtors.

) **DECLARATION OF DEBTOR REGINA
DELRORSE HILL IN SUPPORT OF
MOTION TO VACATE ORDER OF
DISMISSAL ENTERED AUGUST 6, 2018
AND TO REINSTATE THE CASE**

) **HEARING:**

) **DATE:** December 4, 2018

) **TIME:** 10:00 a.m.

) **LOCATION:** 255 E Temple Street.

) Courtroom 1545

) Los Angeles, CA 90017

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DECLARATION OF REGINA DELORSE HILL

I, REGINA DELORSE HILL, declare:

1. I am one of the Debtors in Chapter 13 case number 2:14-25039-NB. As such, I have personal knowledge of the facts stated herein, and if called upon to testify thereto, I could and would do so competently and truthfully.

2. This declaration is made in support of our Motion to Vacate the Dismissal of our bankruptcy case and in response to specific questions raised by the Court.

3. We have not purchased or leased a vehicle since the dismissal of our case.

4. We have not made any expenditure or incurred any aggregate debts greater than \$5,000.00 since the dismissal of our case.

5. Since the dismissal of the case, we have continued to use one of our two vehicles but the other vehicle (the Dodge) is inoperable and has not been used.

6. My husband and I have shared our one vehicle. I have been on disability and my husband has continued to work. He uses the vehicle on a daily basis to travel to and from work. I have several medical problems which require frequent doctor visits. I have been able to borrow vehicles from family members and have used Metrolink and the bus when a vehicle was not available.

7. Our current plan requires a step up in the payment once our current vehicle has been paid off. It was our intention to replace this vehicle with a used vehicle with a similar payment amount and, if approved, request the plan payment not step up as it currently provided by filing a motion to modify the plan. We would not be able to afford to pay \$1,546.00 if we financed a vehicle.

8. We did not want to purchase a \$50,000.00 vehicle. We were attempting to purchase a vehicle which had a payment of approximately \$400.00 per month. We received poor advice from our prior counsel to obtain a financing agreement for "any vehicle," not the specific vehicle we were intending to purchase. We had not found the specific vehicle we wanted to purchase prior to the filing of the motion to incur debt.

9. We did not seek relief from dismissal earlier than now due to the fact that our prior

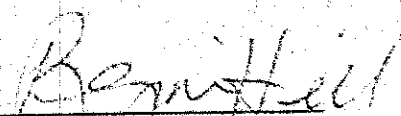
1 counsel assured us that our lender could not foreclose on our property due to the fact that all the
2 arrears to this lender had been cured in full through our bankruptcy plan. We were told that our
3 lender would have to record a new Notice of Default. Once we received the Notice of Sale, we
4 contacted our prior attorney's office and were instructed to contact our lender regarding the mistake.
5 After frustration with our prior attorney's office, we contacted a new attorney who advised us that
6 we needed to file this request for relief. We were in the last year of the plan and want to complete
7 the plan and believe that we can do so if given the opportunity.

8 I declare under penalty of perjury according to the laws of the United States of America that
9 the foregoing is true and correct and that this Declaration is executed on this 3rd day of December,
10 2018 at Los Angeles, California.

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12 /s/ Regina Delorse Hill
13 Regina Delorse Hill
14 Debtor
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6 we needed to file this request for relief. We were in the last year of the plan and want to complete
7 the plan and believe that we can do so if given the opportunity.

8 I declare under penalty of perjury according to the laws of the United States of America that
9 the foregoing is true and correct and that this Declaration is executed on this 7th day of December.
10 2018 at Los Angeles, California.

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12 Regina Delorse Hill
13 Debtor
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In re:

**Michael Dermont Hill
Regina Delorse Hill**

Debtor(s).

CHAPTER: **13**

CASE NUMBER: 2:14-BK-25039-NB

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**800 West 6th Street., Suite 940
Los Angeles, CA 90017**

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF DEBTOR REGINA DELORSE HILL IN SUPPORT OF MOTION TO VACATE ORDER OF DISMISSAL ENTERED AUGUST 6, 2018 AND TO REINSTATE THE CASE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **12/4/2018**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

TRUSTEE Kathy A Dockery (TR) EFiling@LATrustee.com

ATTORNEY FOR CREDITOR Gary D Fidler gfidlerlaw@gmail.com

ATTORNEY FOR CREDITOR Marian Garza ecfnotices@ascensioncapitalgroup.com

ATTORNEY FOR CREDITOR Michelle R Ghidotti ECFNotifications@ghidottilaw.com

ATTORNEY FOR CREDITOR Merdaud Jafarnia bknotice@mccarthyholthus.com,
mjafarnia@ecf.inforuptcy.com

FORMER ATTORNEY FOR DEBTORS Daniel King dking@theattorneygroup.com,
r44432@notify.bestcase.com

ATTORNEY FOR CREDITOR Andrew Kussmaul Andrew.Kussmaul@Bonialpc.com

ATTORNEY FOR CREDITOR Natalie E Lea Natalie.Lea@Bonialpc.com

ATTORNEY FOR CREDITOR Edward G Schloss egs2@ix.netcom.com

ATTORNEY FOR CREDITOR Timothy J Silverman tsilverman@scheerlawgroup.com

ATTORNEY FOR CREDITOR Ramesh Singh claims@recoverycorp.com

U.S. TRUSTEE United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov

ATTORNEY FOR CREDITOR Gagan G Vaideeswaran ecfcacb@aldridgepite.com,
GGV@ecf.inforuptcy.com

ATTORNEY FOR CREDITOR Jennifer H Wang jwang@cookseylaw.com, jwang@ecf.courtdrive.com

ATTORNEY FOR CREDITOR Kristin A Zilberstein ecfnofications@ghidottilaw.com

ATTORNEY FOR DEBTORS Thomas B. Ure tom@urelawfirm.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On ____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

In re: Michael Dermont Hill Regina Delorse Hill Debtor(s).	CHAPTER 13 CASE NUMBER
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3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

12/4/2018

Yolanda Segura

/s/ Yolanda Segura

Date

Printed Name

Signature